UNITED STATES DISTRICT COURT
NORTHER DISTRICT OF TEXAS
DALLAS DIVISION

SUSAN CHANG, as Next Friend of Alison Chang, a minor, And Justin Ho-Wee Wong	§ § § § §	
Plaintiffs,	§	CAUSE NO. 3:07-CV-01767
v.	§ § §	
Virgin Mobile Pty Ltd.,	§ §	
Defendant.	§ §	

PLAINTIFFS' MOTION FOR LEAVE TO RE-SERVE
DEFENDANT VIRGIN MOBILE PTY LTD.

Plaintiffs respectfully request that the Court grant leave so that Plaintiffs may re-serve Defendant Virgin Mobile Pty Ltd, which was served with process through the Texas Secretary of State on October 18, 2007. This request is intended to promote judicial efficiency by obviating any future need to address the defect in service alleged in Defendant's Motion to Dismiss. Because this alleged defect merely concerns the manner in which Defendant was served—*i.e.*, through the Texas Secretary of State rather than by one of the means prescribed by Rule 4(h) of the Federal Rules of Civil Procedure—Defendant will in no way be prejudiced by this Court's decision to allow re-service in a manner consistent with the Federal Rules of Civil Procedure.

Respectfully submitted,

/s/ Ryan H. Zehl____________________

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

I certify, pursuant to Local Rule 7.1, that I attempted to contact Lisa Meyerhoff, counsel for Defendant Virgin Mobile Pty, Ltd. on January 2, 2008 regarding Plaintiff's Motion for Leave to Re-Serve but have not yet heard back regarding whether Defendant consents or objects to the motion.

/s/ Ryan H. Zehl__________
Ryan H. Zehl

CERTIFICATE OF SERVICE

I hereby certify that on the 4 day of January 2008, I electronically filed the foregoing document with the Clerk of the Court for the U.S. District Court, Northern District of Texas, using the Court's electronic case filing system. The system sent a "Notice of Electronic Filing" to the following attorneys of record, all of whom have consented to accept this Notice as service of the document:

Lisa H. Meyerhoff
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/s/ Ryan H. Zehl______________________
Ryan H. Zehl